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January 24, 2025

**VIA EMAIL**

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**Re: AutoExpo Ent. Inc., et al. v. Omid Elyahou et al.**  
**Case No.: 2:23-cv-09249 (OEM) (ST)**

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Dear Counselors:

As you know, we represent Plaintiffs AutoExpo Ent. Inc. (“AutoExpo”), Peace Properties LLC (“Peace Properties”), Network Reinsurance Company Inc. (“Network Reinsurance”), Auto Exchange Center, LLC (“AEC”) and Chrome Insurance Agency LLC (“Chrome Insurance”) (collectively, “Plaintiffs”) in the above-action. Pursuant to Judge Tiscione’s Individual Part Rules, Plaintiffs enclose (i) Plaintiffs’ Opposition to the Certified Defendants’ Motion to Dismiss the Amended Complaint; (ii) Plaintiffs’ Opposition to the Elyahou Defendants’ Motion to Dismiss the Amended Complaint; and (iii) Declaration of Michael Shahkoohi with Exhibits 1 and 2. Pursuant to the Text Only Order, dated October 29, 2024, Defendants should electronically file the respective memorandum of law in opposition and declaration once the motions are fully briefed.

Very truly yours,  
**MILMAN LABUDA LAW GROUP PLLC**  
*Michael C. Mulè*  
Michael C. Mulè

Encl.